



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	No. 1:19-cr-57 (LO)
)	
DANE NICHOLAS HUGHES,)	
)	
Defendant.)	

STATEMENT OF FACTS

The parties stipulate that the following facts are true and correct and that, had the matter gone to trial, the United States would have proven them beyond a reasonable doubt.

1. Beginning in or about 2016, and continuing thereafter until in or about February 2019, the defendant, Dane Nicholas Hughes, also known as Dream, conspired with others to distribute controlled substances, including cocaine, marijuana, Xanax, and THC oils and products. During the course of this conspiracy, the defendant distributed more than 400 kilograms, but less than 700 kilograms, of converted drug weight, as calculated pursuant to § 2D1.1 of the Sentencing Guidelines.

2. During the course and in furtherance of this conspiracy, the defendant became associated with a gang known as the Reccless Tigers and actively participated in a sub-group of the gang known as Club Tiger. The defendant's association with this gang facilitated his drug trafficking activities. The defendant worked for and with Peter Le, one of the gang's leaders. The defendant distributed cocaine, marijuana, Xanax, vape pens containing THC oil, and edibles containing THC for Peter Le and to Peter Le's customers. The defendant collected money from these customers for Peter Le. The defendant also distributed controlled substances he obtained from Peter Le to the defendant's own customers.

3. During the course and in furtherance of this conspiracy, the defendant distributed marijuana and other controlled substances at local high schools, including South County High School in Fairfax County, Virginia, in the Eastern District of Virginia. The defendant distributed marijuana and other controlled substances to persons under the age of 18.

4. On or about June 12, 2018, the defendant, Peter Le, and Anthony Nguyen possessed with the intent to distribute about 20 pounds of marijuana and five ounces of cocaine. On that date, the defendant, Peter Le, and Anthony Nguyen distributed approximately three pounds of marijuana and five ounces of cocaine to an individual in Annandale, Virginia, in the Eastern District of Virginia.

5. From February 2018 through the end of August 2018, the defendant maintained and used the basement of a house in Fairfax Station, Virginia, to store multi-pound quantities of marijuana for subsequent distribution. The defendant paid the owner of the house over \$25,000 in cash for the use of his house.

6.. Beginning on or about September 7, 2018, and continuing until February 2019, the defendant leased and maintained an apartment in Richmond, Virginia, for the purpose of distributing drugs. During this time, the defendant sold marijuana obtained from Peter Le to students at Virginia Commonwealth University. The defendant attended parties and fraternity functions at VCU, at which he distributed marijuana, vape pens, and edibles to VCU students. These products often displayed Reccless Tigers labels, such as clubtiger.hustle.

7. During the course and in furtherance of the conspiracy, the defendant used an Airbnb account to lease properties in the Washington, D.C. area for the purpose of distributing drugs for the Reccless Tigers. For example, in or about February 2019, the defendant leased

through Airbnb a house in Bethesda, Maryland, which was used by Peter Le and the Reccless Tigers to receive and distribute multi-pound quantities of marijuana.

8. During the course and in furtherance of the conspiracy, the defendant collected money for drugs distributed by the Reccless Tigers. The defendant also used Venmo to pay for drugs and to transfer drug money paid to him for drugs distributed by the Reccless Tigers.

9. The acts taken by the defendant, Dane Nicholas Hughes, in furtherance of the offenses charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law. The defendant acknowledges that the foregoing statement of facts does not describe all of the defendant's conduct relating to the offenses charged in this case nor does it identify all of the persons with whom the defendant may have engaged in illegal activities.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By:

James L. Trump
Carina A. Cuellar
Assistant United States Attorneys

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Dane Nicholas Hughes, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate and that, had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Date: 9/23/19

Dane Hughes
Dane Nicholas Hughes
Defendant

I am Dane Nicholas Hughes's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Date: 9/23/19

Ryan Campbell
Ryan Campbell
Counsel for the Defendant